

REMARKS

Claims 1-7, 9-21 and 23-28 are pending in the application.

Claims 1-7, 9-21 and 23-28 have been rejected.

Claims 1 and 15 have been amended as set forth herein.

Claims 1-7, 9-21 and 23-28 remain pending in this application.

Reconsideration of the claims is respectfully requested.

I. CLAIM REJECTIONS -- 35 U.S.C. §103

Claims 1-3, 6, 7, 9, 10, 13-17, 20, 21, 23, 24, 27 and 28 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,094,715 to *Wilkinson, et al.* (hereinafter “Wilkinson”) in view of U.S. Patent No. 4,435,758 to *Lorie et al.* (hereinafter “Lorie”). Claims 4, 5, 18 and 19 were rejected under 35 U.S.C. 103(a) as being unpatentable over Wilkinson in view of Lorie and further in view of U.S. Patent No. 6,470,441 to *Pechanek, et al.* (hereinafter “Pechanek”). Claims 11, 12, 25 and 26 were rejected under 35 U.S.C. §103(a) as being unpatentable over Wilkinson in view of Kubo and further in view of “Multithread VLIW processor architecture for HDTV decoding” to *Kim* (hereinafter “Kim”). The Applicant respectfully traverses the rejections.

In *ex parte* examination of patent applications, the Patent Office bears the burden of establishing a *prima facie* case of obviousness. MPEP § 2142, p. 2100-133 (8th ed. rev. 4, October 2005). Absent such a *prima facie* case, the applicant is under no obligation to produce evidence of nonobviousness. *Id.* To establish a *prima facie* case of obviousness, three basic criteria must be met: *Id.* First, there must be some suggestion or motivation, either in the references themselves or in

the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. *Id.* Second, there must be a reasonable expectation of success. *Id.* Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *Id.* The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *Id.*

Amended independent Claim 1 recites a job buffer, where a job is a combination of a program and an input data-set. In rejecting Claim 1, the Examiner cited the broadcast and control interface (BCI) of Figure 11 of Wilkinson as describing the recited job buffer. The BCI is an interface to an external array controller element and to an array director, providing common node functions such as timers and clocks and a physical interface for broadcast-bus-to-PME (processor memory element) data transfers. *See Wilkinson, col. 24, lines 9-16.* As described in the passage cited by the Examiner, the BCI buffers a broadcast data word until all the attached PME's have used the word. *See Wilkinson, col. 24, lines 48-55.* As such, the BCI of Wilkinson may buffer a single instruction and/or data word, but does not describe a job buffer, where a job is a combination of a program and an input data-set, as recited in amended independent Claim 1.

For at least these reasons, Wilkinson fails to teach or suggest all the limitations of amended independent Claim 1, and the Applicant respectfully submits that Lorie, Pechanek and Kim do nothing to overcome the shortcomings of Wilkinson. Therefore amended independent Claim 1 is patentable over the cited references, alone or in any combination. Amended independent Claim 15 recites limitations analogous to the novel and non-obvious limitations emphasized in traversing the

rejection of Claim 1. Therefore, Claim 15 also is patentable over the cited references. Claims 2-7 and 9-14 depend from Claim 1 and include all the limitations of Claim 1. Claims 16-21 and 23-28 depend from Claim 15 and include all the limitations of Claim 15. As such, Claims 2-7, 9-14, 16-21, and 23-28 also are patentable over the cited references.

Accordingly, the Applicant respectfully requests that the Examiner withdraw the §103 rejection with respect to Claims 1-7, 9-21 and 23-28.

CONCLUSION

As a result of the foregoing, the Applicant asserts that the remaining claims in the Application are in condition for allowance, and respectfully requests an early allowance of such claims.

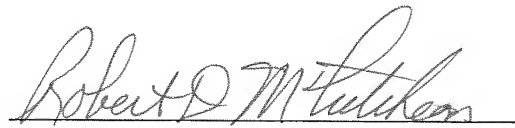
If any issues arise, or if the Examiner has any suggestions for expediting allowance of this Application. The Applicant respectfully invites the Examiner to contact the undersigned at the telephone number indicated below or at *rmccutcheon@munckcarter.com*.

The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Deposit Account No. 50-0208.

Respectfully submitted,

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